LAW OFFICES

JOHN L. PARKER & ASSOCIATES, LTD. 39 SOUTH LA SALLE STREET CHICAGO, ILLINOIS 60603

13121 263-6560

June 11, 1987

Mr. Miles Zamco Manager of Field Operations Division of Air Pollution Control Illinois Environmental Protection Agency 2200 Churchill Road Springfield, IL 62706

Re: Alco Steel Service Company Joliet, Illinois

Dear Mr. Zamco:

This will confirm my telecons with you, Ms. Glatz, and your technical advisor, Tom Hornshaw, on June 9, 1987. We represent the subject Company.

Alco Steel Service Company is a small, locally-owned business. As you know, several inspectors from Illinois EPA visited the Company facility on April 13, 1987, and interviewed Mr. Albert Cohn of Alco. As these inspectors are aware, Alco has not operated its incinerator for some time and does not presently have plans to do so.

I have now had a chance to review a copy of your letter dated June 8, 1987, addressed to Mr. Cohn. I am surprised that you did not communicate with us, as the Alco attorneys, especially in view of our prior requests for copies of the laboratory analysis data, and Illinois EPA's agreement to provide that data as soon as it became available (see handwritten note by J.J. Perino, in margin of our April 14, 1987 letter to Ms. Perino, copy attached hereto). Also, we have not received the information that we requested in our letter to Mr. Cezary Krzymowski of Illinois EPA, dated April 14, 1987 (copy also attached hereto).

EPA Region 5 Records Ctr.

Mr. Miles Zamco Page 2 June 11, 1987

We repeat our prior requests that you please forward us copies of the laboratory analysis results of your testing of samples taken from the Alco facility, and specifically copies of the laboratory data on the ash sample referred to in your letter.

Your letter states that the Alco ash sample had 244 ppb of what you call "TEFs". Please advise the level in ppb of the 2, 3, 7, 8 - TCDD isomer alone in this sample. Also, please advise whether the USEPA level of "5 ppb", about which the USEPA is "concerned", is a reference to 5 ppb of 2, 3, 7, 8 - TCDD alone (as distinguished from other isomers). If so, we would like to know how the level of 2, 3, 7, 8 - TCDD in this ash sample compares with the "5 ppb" level of USEPA. Also, please forward information showing how the validity of the "equivalent concentrations" referred to in your letter was determined.

Please identify for us any statute, rule or other legally enforceable standard, which prescribes the permissible level of either the 2, 3, 7, 8 - TCDD, or what you call "TEFs", so that we may advise our client whether it has exceeded any such standard.

Since receipt of your letter, Alco has secured the area, but we would like to receive the above described information about the basis for your requiring that this be done. Although your letter does not state this as a "requirement", we note from the press release which Illinois EPA gave to the Chicago Sun Times that Alco Steel has been "ordered to shut down their wire-incineration operations" (see Chicago Sun Times, Thursday, June 11, 1987, at page 18). If such an order has been entered, we are unaware of it. Please advise.

Very truly yours,

John L. Parker

Attorney for Alco Steel Service Company

JLP:dsc Encls. (2)

Mailed certified mail -

return receipt requested

No. P 235 432 913

cc: Bobella Glatz, Esq.
w/encls.